No. 18-1501 IN THE

Supreme Court of the United States

CHARLES C. LIU, ET AL.,

Petitioners,

V.

SECURITIES AND EXCHANGE COMMISSION,

Respondent.

PROOF OF SERVICE

I, Rita L. Hemenway of Bateman & Slade, Inc., hereby declare that on this twentieth day of December 2019, I have served three (3) true copies of the Brief of Amicus Curiae New England Legal Foundation in Support of Petitioners by priority mail, postage prepaid, addressed as follows:

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Signed under the pains and penalties of perjury,

<u>Rita L. Hemenway</u>

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My Commission Expires: May 30, 2025